




Re: A Question----Re: Your PSD Presentation at MARAMA 
Himanshu Vyas to: Umesh Dholakia

11/26/2012 02:46 PM

From: Himanshu Vyas/R3/USEPA/US
To: Umesh Dholakia/R2/USEPA/US@EPA

The relevant paragraphs from that linked memo:

EPA has observed that a common mistake is to assume that a unit "could" have emitted up to its permitted amount during the baseline period and this is the amount that can be excluded from the PAE. This notion and any variation of this notion is incorrect. Excluded emissions from the PAE must satisfy two criteria. First, a facility can only subtract that portion of the projected actual emissions that the unit(s) could have already physically and legally emitted during the baseline period. For instance, a facility is permitted to burn coal with a sulfur content up to two percent but actually burns coal with one percent sulfur during the baseline period. The company bases the projected actual emissions on continuing to burn one percent sulfur coal. Emissions that can be excluded would be limited to emissions associated with burning one percent coal, regardless of the limit that would allow them to burn a higher sulfur coal. In other words, the emissions that "could have been accommodated" are not defined by all the many different operating conditions that could have occurred during the baseline period; rather emissions that may be excluded are limited by the proposed operating conditions used to project emissions into the future.

Second, the facility must be able to demonstrate that excluded emissions are completely unrelated to the project. As an example, a facility that proposes to switch from one fuel to another may be able to demonstrate that all of the projected emissions after the change could have occurred during the baseline period using the original fuel type. However, for this example none of the projected maximum annual emissions from the new fuel can be excluded because all of the emissions that will occur after the project are related to the change in fuel.

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Umesh Dholakia

Thanks. Please take a look at Slide 12 (Post Ch...

11/21/2012 10:40:32 AM

From: Umesh Dholakia/R2/USEPA/US
To: Himanshu Vyas/R3/USEPA/US@EPA

Date: 11/21/2012 10:40 AM
Subject: A Question---Re: Your PSD Presentation at MARAMA

Thanks.

Please take a look at Slide 12 (Post Change_EmissionsStep1)- it states that the Highest Monthly Productions Rate....achieved in 24-month baseline period...3600 pcs/mo--then we have to convert it to yearly "could have achieved" rate.....or "could have accommodated " rate-- Is there any guidance memo or applicability letter describing this approach to figure out "could have achieved" rate? Some say that it could be any year in last 10 years- some say that whatever is the design capacity is "could have achieved" (50,000 pcs in your case).....

I have a case where design capacity is 650,000 t/y--but produced 580,000 t/y average due to lack of demand- now after change- they say that they could have achieved 650,000 rate...so give me credit!

Umesh

Himanshu Vyas	Here are the presentations we have given recent...	11/21/2012 10:02:08 AM
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From: Himanshu Vyas/R3/USEPA/US
To: Umesh Dholakia/R2/USEPA/US@EPA
Date: 11/21/2012 10:02 AM
Subject: Re: Your PSD Presentation at MARAMA

Here are the presentations we have given recently:

[attachment "Baseline Actual Emissions-3-26-12.pptx" deleted by Umesh Dholakia/R2/USEPA/US]

[attachment "2b - Post_change_emissionsStep1.ppt" deleted by Umesh Dholakia/R2/USEPA/US]

[attachment "3 - Step 2.pptx" deleted by Umesh Dholakia/R2/USEPA/US]

Hope this helps.

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Umesh Dholakia	Hi! Himanshu: Will you please send me your PS...	11/21/2012 09:56:52 AM
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From: Umesh Dholakia/R2/USEPA/US
To: Himanshu Vyas/R3/USEPA/US@EPA
Date: 11/21/2012 09:56 AM
Subject: Your PSD Presentation at MARAMA

Hi! Himanshu:

Will you please send me your PSD presentation- the one I saw stopped at BAE-Step 1...and stated further info will be in the next presentation- which I did not see (on Google). Please send me both presentations--Thanks.

Umesh

